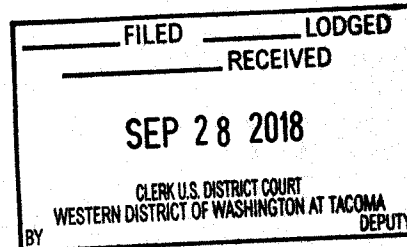


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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JAMES DOUGLAS CHRISTIANSON

Plaintiff(s),

v.

DONALD WAYNE FERRELL

JAMES EDWIN ROGERS

SEDERIS WILLETTE WRIGHT

Defendant(s).

CASE NO. **CV18 1435** *RAJ*

[to be filled in by Clerk's Office]

COMPLAINT FOR VIOLATION OF
CIVIL RIGHTS
(for use only by plaintiffs not in custody)

Jury Trial: ☒ Yes ☐ No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

JAMES D. CHRISTIANSON
c/o 2906 SW 339th Street
Federal Way, WA 98023
(206) 553-9158

B. Defendant(s)

#1 – DONALD WAYNE FERRELL
4127 NE 96th Street
Seattle, WA 98115
(206) 522-5027
(206) 856-0487

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1 #2 JAMES EDWIN ROGERS
2 5217 – 16th Ave. NE
3 Seattle WA 98105
4 (206) 523-4701

5 #3 SEDERIS WILLETTE WRIGHT
6 PO BOX 15312
7 Lenexa, KS 66285
8 (626) 799-2724

9 **II. PREVIOUS LAWSUITS**

10 Have you brought any other lawsuits in any federal court in the United States:?

11 ☒ No ☐ Yes If yes, how many? Click here to enter text..

12 **III. BASIS FOR JURISDICTION**

13 Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any
14 rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens*
15 *v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may
16 sue federal officials for the violation of certain constitutional rights.

17 A. Are you bringing suite against (*check all that apply*):

- 18 ☐ Federal officials (a *Bivens* claim)
19 ☒ State or local officials (a § 1983 claim)

20 B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or
21 immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are
22 suing under section 1983, what federal constitutional or statutory right(s) do you claim
23 is/are being violated by state or local officials?

24 My right to notice and the chance to be heard before being jailed and due process.

My right to a court-appointed attorney.

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1 My right to NOT have excessive bail.

2 My right to not be imprisoned for an untrue/false statement or testimony.

3 Click here to enter text.

4 C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional
5 rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are
6 being violated by federal officials?

7 D. Section 1983 allows defendants to be found liable only when they have acted "under
8 color of any statute, ordinance, regulation, custom, or usage, of any State or Territory
9 or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983,
10 explain how each defendant acted under color of state or local law. If you are suing
11 under *Bivens*, explain how each defendant acted under color of federal law. Attach
12 additional pages if needed.

13 They petitioned for or ordered me to be jailed without being heard. A hearing was
14 conducted in May 2015 without any notice to me. A bench warrant was issued. The judge knew
15 I was in jail and let me sit there for 2 days without being heard and I was not permitted to testify
16 at the first hearing and the power to release me was granted by the judge to Don Ferrell who
17 stated in writing that he is my enemy and always will be and so was his client Sederis Wright.

18 Sederis and Don Ferrell continued to push to keep me in jail for something they KNEW I
19 did not do (deprive the mother of my child access to her medical records). AFTER the mother
20 spoke with records keepers she continued to commit a FRAUD upon the court by saying I was
21 still depriving her (of this thing she obtained). Upon my compliance with the judge's draconian
22 harsh order, Ferrell and Wright continued to push to keep me in jail then later agreed to my
23 release only when it was inevitable.

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IV. STATEMENT OF CLAIM

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Same as above. I was imprisoned without notice and ordered to comply with something I already complied with a civil order to give the abandoning mother of my child access to school and medical records. She never asked for them before this time nor since to my knowledge. This was an abuse of the process to jail be for fun and pleasure. I was ordered excessive bail of \$25,000. The power of my release was granted by Judge Rogers to co-conspirator Don Ferrell. After I complied with the terms required for release, Ferrell still pushed to keep me in jail then two days later agreed to my release for the SAME compliance I completed two days earlier.

Judge Rogers does NOT have immunity because he stepped outside of his authority and violated my right to freedom, liberty, and property without due process. He is not allowed to do so just like he is not allowed to do "anything he wants" in his courtroom. To wit he cannot get off the bench and stab me because it's his courtroom. He does not enjoy immunity from depriving me of a right if it is not done via due process.

Then out of this Ferrell and Wright conspired to abuse the process to hold me in contempt for lying when I spoke truth and Ferrell and Wright sought more jail time.

A. Where did the events giving rise to your claim(s) occur?

Seattle, WA but that is in improper venue because at least 2 defendants may know judges in Seattle federal court.

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1
2 B. What date and approximate time did the events giving rise to your claim(s) occur?

3 May 2015 to October 15, 2018.

4 C. What are the facts underlying your claim(s)? *(For example: What happened to you?*
5 *Who did what? Was anyone else involved? Who else saw what happened?)*

6 I incurred over \$2,500 in attorney fees. My daughter and I suffered inexplicable
7 emotional and psychological stress by me being placed in jail WITHOUT a HEARING solely on
8 the allegation that I did a civil wrong by not letting an abandoning mother access school and
9 medical records that she already had contact info for.

10 **V. INJURIES**

11 *If you sustained injuries related to the events alleged above, describe your injuries and state*
12 *what medical treatment, if any, you required and did or did not receive.*

13 Deprivation of \$2,000 potential income or more. \$2,500 in attorney fees. Sever emotional
14 and psychological stresss and so suffered the child.

15
16
17 **VI. RELIEF**

18 *State briefly what you want the court to do for you. Make no legal arguments. Do not cite any*
19 *cases or statutes. If requesting money damages, include the amounts of any actual damages*
20 *and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.*

21 \$5,500 in attorney fees and lost wages. \$2,000 in counseling costs for the child.
22 \$1,000,000 punitive damages each against Don Ferrell and James Rogers and \$5,000 punitive
23 damages against Sederis Wright.

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VII. CERTIFICATION AND CLOSING

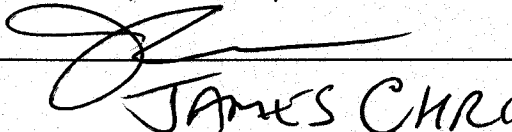
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

9/28/2018

Signature of Plaintiff



Printed Name of Plaintiff

JAMES CHRISTENSEN